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 ALBERT RICHARDS  
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9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

12 ALBERT RICHARDS,

13 Plaintiff,

14 v.

15 CENTRIPETAL NETWORKS, LLC, f/k/a/  
 CENTRIPETAL NETWORKS, INC.; CNI  
 16 HOLDINGS, INC.; ALSOP LOUIE  
 MANAGEMENT LLC; ALSOP LOUIE  
 17 CAPITAL 2, L.P.; ALSOP LOUIE  
 PARTNERS 2, LLC; OCEAN TOMO, LLC;  
 18 STEVEN ROGERS; and JONATHAN  
 ROGERS,

19 Defendants.

Case No. 4:24-cv-01065-HSG

**STIPULATION AND [ORDER  
CONTINUING DATE TO AMEND  
PLEADING AND RESPONSIVE  
DEADLINES PURSUANT TO L.R. 6-1(b)  
and 6-2]**

Trial Date: None Set  
 Judge: Hon. Haywood S. Gilliam, Jr.  
 Complaint Filed: February 21, 2024

1           **JOINT STIPULATION AND ORDER ON PLAINTIFF'S REQUEST TO EXTEND THE**  
2           **DEADLINE TO AMEND PLEADING AND RESPONSIVE DEADLINES PURSUANT TO**  
3           **L.R. 6-1(b) and 6-2**

4           Pursuant to Local Rules 6-1(b) and 6-2, Plaintiff Albert Richards ("Plaintiff") and  
5           Defendants Centripetal Networks, LLC, f/k/a/ Centripetal Networks, Inc., CNI Holdings, Inc.,  
6           Alsop Louie Management LLC, Alsop Louie Capital 2, L.P., Alsop Louie Partners 2, LLC, Ocean  
7           Tomo, LLC, Steven Rogers, and Jonathan Rogers (collectively, "Defendants") hereby stipulate as  
follows:

8           WHEREAS, on February 21, 2024, Plaintiff filed his Complaint in this action (ECF No.  
9           1);

10          WHEREAS, on June 24, 2024, Defendants filed motions to dismiss the Complaint (ECF  
11          Nos. 48-51);

12          WHEREAS, on August 16, 2024, Plaintiff filed an Administrative Motion to Consider  
13          Whether Material Should be Sealed ("Administrative Sealing Motion"), attaching a proposed  
14          redacted First Amended Complaint ("FAC"), and lodged the unredacted FAC provisionally under  
15          seal so as not to prejudice Defendants' rights (ECF Nos. 60, 60-1);

16          WHEREAS, on September 19, 2024, Plaintiff filed his Motion for Leave to Amend  
17          Complaint (ECF No. 76);

18          WHEREAS, on October 31, 2024, the Court issued an Order Granting Motion for Leave to  
19          Amend Complaint, directing Plaintiff to file an unredacted version of the FAC as a separate docket  
20          entry by November 4, 2024 (ECF No. 89);

21          WHEREAS, Defendants have requested that Plaintiff delete certain allegations from the  
22          unredacted version of the FAC due November 4, 2024, on the ground that those allegations, if  
23          public, will prejudice Centripetal, and;

24          WHEREAS, the parties agree that additional time is appropriate to allow the parties to  
25          resolve Defendants' request.

26          NOW, THEREFORE, it is hereby stipulated and agreed by and between the parties,  
27          subject to the Court's approval, that the current schedule be modified as follows:

28          / / /

1. Plaintiff shall have to and including November 6, 2024, by which to file an unredacted FAC.

2. Changes to the FAC filed on November 6, 2024, from that version of the FAC lodged with the Administrative Sealing Motion are made without prejudice to any of Plaintiff's claims or rights.

3. Defendants' responses to the FAC shall be due on or before November 27, 2024.

**SO STIPULATED.**

DATED: November 4, 2024

ROPER MAJESKI, PC  
MARTIN DIOLI

## KRAMER LEVIN NAFTALIS FRANKEL LLP

By: /s/ Jonathan M. Wagner  
JONATHAN MARK WAGNER  
Attorneys For Defendants  
CENTRIPETAL NETWORKS, LLC, f/k/a/  
CENTRIPETAL NETWORKS, INC., CNI  
HOLDINGS, INC., OCEAN TOMO LLC,  
STEVEN ROGERS, and JONATHAN ROGERS

DATED: November 4, 2024

QUINN EMANUEL URQUHART & SULLIVAN

By: /s/ David Eiseman  
DAVID EISEMAN  
Attorneys for Defendants  
ALSOP LOUIE MANAGEMENT LLC, ALSOP  
LOUIE CAPITAL 2 L.P., and ALSOP LOUIE  
PARTNERS 2, LLC

1 DATED: November 4, 2024

COBLENTZ PATCH DUFFY & BASS LLP

2  
3 By: /s/ Timothy P. Crudo

4 TIMOTHY P. CRUDO

5 Attorneys for Plaintiff

6 ALBERT RICHARDS

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**ATTESTATION**

I, Timothy Crudo, am the ECF user whose identification and password are being used in this filing. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all other signatories to this document have concurred in the filing of this document.

7 DATED: November 4, 2024

COBLENTZ PATCH DUFFY &amp; BASS LLP

9 By: /s/ Timothy P. Crudo  
10 TIMOTHY P. CRUDO

## ORDER

Plaintiff shall have to and including November 6, 2024, by which to file an unredacted FAC. Changes to the FAC filed on November 6, 2024, from that version of the FAC lodged with the Administrative Sealing Motion are made without prejudice to any of Plaintiff's claims or rights. Defendants' response to the FAC shall be due on or before November 27, 2024.

IT IS SO ORDERED.

DATED: 11/5/2024

  
THE HONORABLE HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE